

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HEATHERWOOD ESTATES CONDO)	
ASSOCIATION,)	
Plaintiff,)	
)	
v.)	Case No. 2020 L 010971
)	
NATIONWIDE PROPERTY &)	
CASUALTY INSURANCE COMPANY,)	
)	
Defendant.)	

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Defendant, NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY (“Nationwide”), moves this court pursuant to Rule 56 of the Federal Rules of Civil Procedure, to enter summary judgment in its favor and against the Plaintiff, on Plaintiff’s one count complaint for breach of contract, and in support thereof submits the following:

1. Affidavit of Samuel L. Crunkleton, and exhibits cited therein;
2. Statement of Facts pursuant to LR 56.1, and
3. Memorandum of Law.

SUMMARY OF ARGUMENT

- I. Plaintiff’s action is barred by the policy’s suit limitation provision.

WHEREFORE, Defendant Nationwide Property & Casualty Insurance Company prays that this court enter summary judgment in its favor and against the Plaintiff on the Plaintiff’s one count complaint for breach of contract, or for such further or additional relief as is just and necessary.

Respectfully submitted,

By: /s/ John J. Piegore

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